Claims 5-13, 15-23 and 25-27 stand rejected under 35 U.S.C. Sec. 103(a) as being unpatentable over the combination of *Barry et al.* in view of *Matias*. This rejection is respectfully traversed.

Applicants believe that there is a misunderstanding about the operation of the *Barry et al.* system and discussion of such might be appropriate. *Barry et al.* discloses a system that receives pages in a *sequential* operation. (Col. 3, line 36). Each page is then stored in a print buffer, for example, or it can be routed to an engine. The Examiner has interpreted the language at Column 3, lines 42-44 as providing the ability for the print job to be routed *in accordance with* job parameters associated therewith. The system does not operate like that; rather, what the *Barry et al.* system does is to receive a print job in the form of a number of sheets of pages and sequentially output those sheets in the same sequence that they were received. This operates in accordance with a job parsing algorithm that operates in conjunction with a print engine (10) and a print buffer (16) which will eject the page at the appropriate time. In operation with four engines, for example, what will happen is that the job distributor will distribute pages to engines 1, 2, 3 and 4 in a sequential manner such that that is the order of the pages. Each of the pages can be finished in a different time, depending upon the speed of the engine, at which time the page will be entered into the print buffer. This page will be maintained into the print buffer and the print manager (34) will determine when it is "ejected" to the output combiner (20). For example, if print engine 2 finishes first, the print buffer (16) will not eject the page until the print buffer (16) associated with print engine 1 ejects its pages, this being required to maintain the sequence. However, the next page to be output by the print manager will be page 5. This is described in detail with respect to FIGURE 6 viewing the right side. It can be seen that the pages 1-4 will be initially sent to the print engines. The print manager will send no further pages until page 1 is finished and then the next page in the sequence will be sent, that being page 5, and this being sent to print engine 1. Next, page 3 is finished, and then page 6, the next page in the sequence, routed to engine 3. The next page to finish is that in engine 2. This engine being free, it will then receive page 7. However, it is the control of the ejection operation by the print manager that controls the sequence that pages are output and also tells the job distributor which engine to route the page to next, i.e., the one that is free. This routing is not

a function of the job or the parameters of the image but, rather, it is a function of the feedback from the engines and the parameters of the engine. Therefore, *Barry et al.* does not in any way disclose how the routing or distribution of the job is done according to parameters associated with the print job. This print job is merely handled in the way it was input to the distributor, i.e., in a sequential manner. The distribution is a function of the parameters of the print. engines and how fast they are operable to process a page. Further, there is no disclosure wherein job parameters associated with the rasterized data after printing is utilized. Therefore, this element is lacking in both *Barry et al.* and in *Matias*.

Another aspect of *Barry et al.*, and one that does not suggest combination of *Barry et al.* with *Matias*, is the fact that *Barry et al.* teaches against utilizing a single RIP. In Column 8, beginning at line 4, *Barry et al.* sets forth that this system does not require a single high speed RIP, due to the fact that it would increase the complexity and that the preferred way would be to utilize multiple modified RIPs. As such, this would teach against the combination of a multiple print engine system with a single RIP single engine disclosure, that being *Matias*.
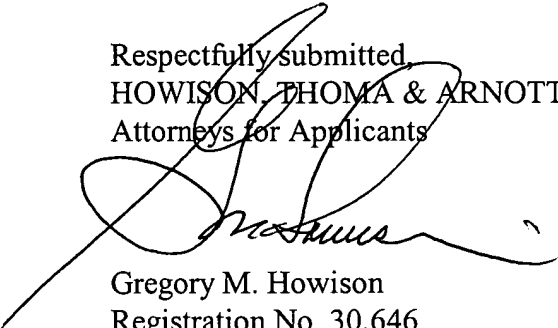
In view of the above, Applicants believe that the *Barry et al.* reference falls short of disclosing the invention as defined in the claims and, therefore, Applicants respectfully request withdrawal of the 35 U.S.C. Sec. 103(a) rejection with respect to the rejected claims.

Applicants again note with appreciation the Examiner's indication that Claims 14 and 24 would be allowable if rewritten to include the limitation of the base claims. However, Applicants believe that, in view of the above arguments, the amended claims distinguish over the *Barry et al.* and *Matias* references.

Applicants have now made an earnest attempt in order to place this case in condition for allowance. Please charge any additional fees or deficiencies in fees or credit any overpayment to Deposit

Account No. 20-0780/TRSY-23,677 of HOWISON, THOMA & ARNOTT, L.L.P.

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September 11, 2002